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MEMO ENDORSED

April 7, 2023

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Plaintiff is directed to file a status letter in regard to Case No. 19-cv-9399 by Monday, May 8, 2023. In regard to Case Nos. 19-cv-9400, 19-cv-9402, and 19-cv-9403, counsel is directed to refer to the Court's Individual Practice Rules for instructions for moving for default judgment. IT IS SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: April 7, 2023
New York, New York

**Re: *Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.*,
Case No. 19-cv-9399 (“Case I”)
Just Play, LLC v. AdaAda, et al.
Case No. 19-cv-9400 (“Case II”)
Just Play, LLC v. 22H, et al.
Case No. 19-cv-9402 (“Case III”)
Just Play, LLC v. Marvel, et al.
Case No. 19-cv-9403 (“Case IV”)
Status Letter**

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced related action, and submit the instant letter in accordance with the directives of the Court’s Order entered on March 31, 2023 (Case I, Dkt. 92) (“March 31, 2023 Order”).

In Case II, Case III and Case IV, while Plaintiff has not filed any documents on the docket in over a year, Plaintiff’s counsel has engaged in settlement discussions with some of the Defendants over the past year, all of which have now broken down. Accordingly, and because none of the Defendants have appeared or otherwise expressed an intention of appearing in Cases II – IV, Plaintiff respectfully requests to file a Motion for Default Judgment against all Defendants remaining in Case II, Case III and Case IV by no later than May 5, 2023.

With respect to Case I, Plaintiff’s counsel has attempted to communicate with Sergei Orel, counsel for the only the Orel Defendants to no avail. Mr. Orel provided Plaintiff’s counsel with deficient discovery responses in April of last year and has not responded to any of Plaintiff’s counsel’s e-mails since then. Just recently, however, an attorney, who, upon information and belief, previously worked with Mr. Orel contacted our office indicating that she likewise has been unable to reach Mr. Orel and advised that the Orel Defendants seek to re-open settlement discussions with Plaintiff. Accordingly, Plaintiff respectfully requests that the Court allow time for Plaintiff and the Orel Defendants to discuss settlement and Plaintiff proposes providing the Court with a status update within thirty (30) days.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle (Yamali) Futterman

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